

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Section 304 of the)	CS Docket No. 97-80
Telecommunications Act of 1996)	
)	
Commercial Availability of)	
Navigation Devices)	

**COMMENTS OF THE
MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

C. Bradley Hunt
Executive Vice President and
Chief Technology Officer
Motion Picture Association of America, Inc.
15503 Ventura Boulevard
Encino, California 91436
(818) 995-6600

January 20, 2006

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of Section 304 of the Telecommunications Act of 1996)	CS Docket No. 97-80
)	
Commercial Availability of Navigation Devices)	
)	

**COMMENTS OF THE
MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

The Motion Picture Association of America, Inc. (MPAA) and its member companies support technological innovations that enable new digital distribution channels and new consumer uses of content. The implementation of downloadable security can provide a lower cost, renewable form of security, which can benefit cable operators, device manufacturers, and consumers. Downloadable security provides a superior means for cable MSOs to ensure that they can have the flexibility necessary to update the protections they employ to preserve the valuable programming services they provide to consumers. A flexible means of updating security makes sense in today's digital world, where technological efforts to break multichannel video programming distributors' (MVPD) conditional access security are becoming more and more sophisticated.

However, MVPDs are not the only stakeholders that deserve the opportunity to protect their valuable service from unauthorized expropriation. Just as MVPDs should be able to use flexible means to enhance the protection of their valuable services, content owners should reasonably expect that they will also have the ability to enhance the technological protection and

rights management of their content and to expect that the underlying distribution system continually incorporates such enhancements.

In that regard, the MPAA has been involved in discussions with CableLabs in order to improve upon the content protection associated with the Downloadable Conditional Access System (DCAS) technology and license. The MPAA and CableLabs have already come to agreement on such important issues as the incorporation of a Redistribution Control Trigger bit to provide more rights management flexibility and the explicit requirements for generating analog Copy Generation Management System (CGMS-A) signaling as part of steps to address the Analog Hole. The MPAA plans to hold further discussions with CableLabs to address additional issues in the DCAS license, which was submitted to the FCC in these proceedings. Such further issues include content providers' involvement in the change management process, improvements in the DCAS Robustness Rules, and additional steps to address the Analog Hole problem.

Technological innovation is rapidly changing the way content is delivered to consumers. Indeed, in the past few years since the Commission first adopted the Unidirectional Digital Cable Plug and Play rules, many aspects of those rules, which remain subject to reconsideration, already have become obsolete. The MPAA member companies want to take advantage of technological innovations to better serve consumers. The MPAA and its members plan to stay

actively engaged in DCAS discussions with CableLabs as well as the FCC regulatory process, and we stand ready to directly participate in discussions with the cable and consumer electronics industries.

Respectfully submitted,

THE MOTION PICTURE ASSOCIATION OF
AMERICA, INC.

By: C. Bradley Hunt
C. Bradley Hunt
Executive Vice President and
Chief Technology Officer
Motion Picture Association of America, Inc.
15503 Ventura Boulevard
Encino, California 91436
(818) 995-6600